

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c)

Cabanillas & Associates, PC
Paola D. Vera, Esq.
120 Bloomingdale Rd., Suite 400
White Plains, NY 10605
914-385-0292

In Re:

Case No.: 18-23886-RG

Luz M. Villafane

Debtor(s).

Hearing Date: 1/15/20
Chapter: 13

DEBTOR'S OPPOSITION TO TRUSTEE'S MOTION TO DISMISS

The above named debtor, by and through her attorney of record, Paola D. Vera, Esq. of Cabanillas & Associates, P.C., hereby opposes Trustee's Motion to Dismiss, and in support thereof presents the Certification of Paola D. Vera, Esq. and shows unto the Court the following:

1. On July 11, 2018 the Debtor filed a voluntary Chapter 13 petition with the clerk of this court.
2. On December 5, 2019, the Chapter 13 Standing Trustee filed a Motion to Dismiss due to Debtor being delinquent on Trustee payments.
3. As of December 5, 2019 the Debtor is delinquent in Trustee payments in the amount of \$6,321.40
4. The Debtors respectfully request the opportunity to cure the amount owed in Trustee payments.

5. The Debtor would like to increase the Trustee payments to include the \$6,321.40 owed to the Trustee for the remaining 43 months.

6. The Debtor respectfully requests that the Trustee payment commencing in January 2020 be increased to \$2,680.00.

WHEREFORE, the debtor respectfully request that the instant Motion be denied; and the debtor be allowed to enter into a Consent Order and for such other and further relief as this Court deems proper.

Dated: Union City, New Jersey
December 31, 2019

CABANILLAS & ASSOCIATES, PC

/s/Paola D. Vera
Paola D. Vera, Esq.
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Union City, New Jersey 07087